

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 15-10153-WGY
)
)
 DAVID WRIGHT,)
 Defendant.)

**GOVERNMENT'S MOTION FOR PROTECTIVE SECURITY MEASURES
DURING TESTIMONY OF FBI'S CONFIDENTIAL HUMAN SOURCE**

The government hereby moves to partially close the courtroom and institute protective security measures during the testimony of one witness, a FBI confidential human source ("CHS"), during the trial. Specifically, through this motion, the government seeks to prevent the public disclosure of the CHS's true identity, his biographical data including his place of birth, and his facial image. Such information would jeopardize the CHS's public safety and that of his family who are located in Yemen, an area that is controlled in large part by the Islamic State of Iraq and al-Sham ("ISIS"), the group to which the defendant is charged with providing material support. As described in detail below, the defendant told the CHS that he would "behead" anyone who betrayed him by providing information to law enforcement. Recently, the defendant has sought the assistance of a fellow prison detainee to "neutralize" the CHS. Similarly, ISIS has repeatedly issued fatwas or religious orders to kill those who cooperate with the United States and its allies (viewed as "kafir," that is, non-believers) or testify against supporters or members of ISIS like the defendant.

August 24, 2017
Motion denied without hearing. The courtroom will not be closed or partially closed. The Court will devise adequate protective security measures for the witness while, at the same time, preserving the defendant's rights of confrontation.
William M. Young
District Judge